

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

NO. 21-cr-10047-RGS

MARK JOSEPH AHN,

DEFENDANT.

**MOTION FOR REDUCTION IN SENTENCE**  
**PURSUANT TO 18 U.S.C. § 3582(c)(1)(A)**

Defendant, Mark Joseph Ahn (“Ahn”), through undersigned counsel, respectfully moves this Court pursuant to 18 U.S.C. § 3582(c)(1)(A), as amended by § 603(b)(1) of the First Step Act of 2018, Pub. L. 115-391, 132 Stat. 5194, 5239 (Dec. 21, 2018), for an order reducing his sentence to time served because he presents multiple “extraordinary and compelling reasons” for compassionate release as set forth in his supporting memorandum of reasons.

Respectfully submitted,

/s/Brandon Sample

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*Counsel Pro Hac Vice for Mark Ahn*

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<sup>1</sup> Mr. Sample is admitted in Vermont, and limits his practice to federal matters before federal courts and agencies.

**CERTIFICATE OF CONFERENCE**

I certify pursuant to Local Rule 7.1(a)(2) of this Court that I have conferred with AUSA Kriss Basil concerning this motion and been advised that the United States will likely oppose relief, but could not offer a definitive position until reviewing the filed.

/s/Brandon Sample  
Brandon Sample

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served this 5th day of October, 2021, via CM/ECF on all counsel of record.

/s/Brandon Sample  
Brandon Sample